

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

NEONODE SMARTPHONE LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD.  
and SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendants.

**Civil Action No. 6:20-cv-00507-ADA**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER,  
OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Plaintiff Neonode Smartphone LLC (“Neonode”) hereby moves to extend the time within which Defendants Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) are required to move, answer, or otherwise respond to Plaintiff’s complaint. The parties have stipulated to the extension of time requested in this Motion. Accordingly, this Motion is UNOPPOSED.

On June 8, 2020, Neonode filed a complaint alleging patent infringement by SEC and SEA. (*See* Dkt. No. 1).

On June 15, 2020, Neonode served on SEA the summons and complaint. (*See* Dkt. No. 9). Accordingly, SEA’s deadline to respond to the complaint is July 6, 2020.

SEA and SEC have agreed to waive service on SEC, a foreign entity, in exchange for an extension of time for both SEA and SEC to respond to the complaint. The parties

have stipulated to extend the time for SEA and SEC to move, answer, or otherwise respond to the complaint through and including September 25, 2020. The parties further agree that SEC is deemed to have been served on June 15, 2020.

WHEREFORE, Plaintiff Neonode Smartphone LLC, respectfully requests that the time in which Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. are required to move, answer, or otherwise respond to Plaintiff's complaint be extended to and including September 25, 2020.

DATED: June 24, 2020

Respectfully submitted,

By: /s/ Philip J. Graves

Philip J. Graves (CA State Bar No. 153441)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
301 North Lake Avenue, Suite 920  
Pasadena, CA 91101  
Telephone: (213) 330-7147  
Facsimile: (213) 330-7152  
Email: [philipg@hbsslaw.com](mailto:philipg@hbsslaw.com)

Greer N. Shaw (CA State Bar No. 197960)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
301 North Lake Avenue, Suite 920  
Pasadena, CA 91101  
Telephone: (213) 330-7150  
Facsimile: (213) 330-7152  
Email: [greers@hbsslaw.com](mailto:greers@hbsslaw.com)

Craig D. Cherry  
State Bar No. 24012419  
[ccherry@haleyolson.com](mailto:ccherry@haleyolson.com)  
Justin W. Allen  
State Bar No. 24081977  
[jallen@haleyolson.com](mailto:jallen@haleyolson.com)  
**HALEY & OLSON, P.C.**

100 N. Ritchie Road, Suite 200  
Waco, Texas 76712  
913 Franklin Ave., Suite 201  
Waco, Texas 76701  
Telephone: (254) 776-3336  
Facsimile: (254) 776-6823

*Counsel for Plaintiff Neonode Smartphone LLC*

CERTIFICATE OF CONFERENCE

I hereby certify that on June 23, 2020, the undersigned, as counsel for Plaintiff, conferred with Kim Gustafson Bueno, counsel for Defendants, by email regarding the issues raised by this motion and she indicated Defendants are UNOPPOSED to the relief sought herein.

/s/ Philip J. Graves  
Philip J. Graves

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of June, 2020, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system and will send the document via electronic mail to the following:

Kimberly Gustafson Bueno  
Scott Douglass & McConnico, LLP  
303 Colorado, Ste. 2400  
Austin, Texas 78701  
Email: kbueno@scottdoug.com

DATED: June 24, 2020

/s/ Elizabeth A. Crooks  
Elizabeth A. Crooks